

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

THE AKRON BAIL FUND,

Plaintiff,

v.

THE CITY OF AKRON,

Defendant.

Civil Action No. 5:23-cv-837

MOTION FOR TEMPORARY RESTRAINING ORDER

Plaintiff respectfully moves this Court, under Fed. R. Civ. P. 65(b), for a temporary restraining order prohibiting the City of Akron from using chemical weapons and other less lethal weapons to quell peaceful protests and from using any other measure that unlawfully restricts constitutionally protected speech. Plaintiff attaches and incorporates by reference a Memorandum in Support of its Motion, a Proposed Temporary Restraining Order, and several exhibits. Plaintiff also incorporates by reference the facts set forth in its contemporaneously filed Complaint. Plaintiff certifies, under Rule 65(b) that it has put Defendant on notice of its Motion by emailing copies of its filings to counsel for the City of Akron. Therefore Plaintiff moves the Court for an immediate hearing on its Motion and/or requests that the Court enter the TRO immediately.

Respectfully submitted,

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Certificate of Service

I certify that on April 20, 2023 I filed a copy of the foregoing using the Court's CM/ECF system and that I delivered a copy to counsel for the City of Akron by email.

/s/ Elizabeth Bonham
Elizabeth Bonham (0093733)
One of the attorneys for Plaintiffs